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ERA

Emmbrook Residents' Association

ONE VOICE

REPRESENTING EMMBROOK RESIDENTS

Mr Connor Corrigan,
Development Management,
Wokingham Borough Council,
Shute End,
Wokingham,
RG40 1WR

Dear Mr Corrigan, 17th February 2015

RESPONSE TO OUTLINE PLANNING APPLICATION O/2014/2242 FOR NORTH WOKINGHAM SDL PHASE 3, MATTHEWSGREEN FARM - VERSION 2

This response is based on the ERA's original response dated 3rd January 2015 amended to take into account the application amendments and additions submitted by the developers on 22nd January. In order to differentiate the changes and additions from the original they are shown in blue typeface. As before, the response focuses on the impact this development will have on the areas immediately adjoining it, that is Emmbrook and Joel Park, although the size of the proposed development means it will have an effect on a far wider area.

It should be noted that any reference to the applicant or the developer in this document includes the agents and consultants representing Bovis Homes and Gleeson Developments in this proposal.

Transport Assessment – Travel Demand and Traffic Impact Assessment

The applicant has supplied a large volume of data in support of his proposal, but the main source of this data is the Wokingham Strategic Transport Module version 3 (WSTM3) and the local traffic measurements sponsored by the applicant earlier this year. Any failings or shortcomings in this base data would be reflected in outputs derived from them, so it is worthwhile examining them in some depth.

It is noted that, apart from Table 6.1 of the Transport Assessment, all references to vehicle flows in the applicant's documentation are basic numbers of vehicles rather than passenger car units (pcu) as defined in WebTAG Unit 3.9.5. In order to avoid confusion and to allow direct comparison with the WSTM3 output the base data from the various traffic counts have been converted to pcu's using the factors given in the WebTAG unit.

The Wokingham Strategic Transport Model 3

The WSTM3 is a strategic model which looks far beyond the Borough boundaries in order to model the traffic flows within the Borough, which it does with a very broad brush. This became apparent in autumn 2013 when the ERA was responding to the consultation on the routing of the proposed Northern Distributor Road (NDR).

Examination of the link and junction turning flows given in the WSTM3 2010 baseline output showed some rather bizarre values for the Emmbrook area which did not match what was happening in reality. This mismatch was queried with Wokingham Borough Council (WBC) who stated that the model had been properly calibrated and validated to accepted national standards. On further questioning it became clear that there was only one calibration point in the vicinity of Emmbrook, which was on the A321 Milton Road with the next nearest on the A329 Reading Road in Winnersh. As it was concluded that the WSTM3 was not fine grained enough to accurately model the traffic on the residential streets of Emmbrook, the ERA undertook some peak hour traffic counts to gain a truer view of the actual traffic in the area. The counts took place between the 8th and 22nd of October 2013 on midweek days as is standard practise, and the results were published in the ERA's response to WBC's NDR consultation in November 2013. A comparison of the current WSTM3 and ERA figures can be made from Table 1 shown in Appendix 1, where the most extreme divergences are highlighted in red.

The above comments and observations remain valid.

The Developer's Traffic Survey

The applicant commissioned some automatic flow counts and manual junction turning counts (ATC and MCC respectively) in the area around the proposed development. The MCC 2014 baseline figures are also given in Appendix 1 for comparison with the WSTM3 and ERA figures. From the few junctions that can be compared, it can be seen from Table 1 that, in general, the MCC figures are significantly lower than those of the ERA October 2013 count. It is not immediately obvious why this should be, until the date of the MCC count is considered. This was the 15th July, which was just one week before the local schools broke up for the summer recess, when the GCSE and A level students would have finished their examinations. It is also well into the summer holiday season when people not tied to the school year may well choose to take their holiday to avoid this most crowded time of year. In view of this a further peak hour count was undertaken by the ERA at the Emmbrook Road/Toutley Road/Matthewsgreen Road junction in November 2014, the results of which are given in Table 3 below. Unsurprisingly, this agrees far more closely with the October 2013 count than it does with the Stuart Michael Associates (SMA) July 2013 count, which reinforces the doubt regarding the validity of the SMA's figures in representing the normal workday traffic in the area.

TABLE 2 - comparison of peak hour turning flows for Junction 4 Emmbrook Road, Toutley Road & Matthewsgreen Road

		A M		P M	
ROAD	FLOW INTO	SMA July 2014	ERA Nov 2014	SMA July 2014	ERA Nov 2014
Matthewsgreen Road	Emmbrook Road	267	278	332	336
	Toutley Road	35	73	40	51
Emmbrook Road	Matthewsgreen Road	405	494	163	217
	Toutley Road	11	6	16	17
Toutley Road	Emmbrook Road	25	20	15	12
	Matthewsgreen Road	83	95	71	82
Total movements		825	966	637	715

Tables 1 and 2 have been revised to take account of the revised MCC figures submitted by the developer, but the changes do not detract from the conclusions drawn on the developer's traffic surveys given above, if anything, they reinforce them.

The problem with comparing the October 2013 figures with those of July 2014 is that those of July 2014 excluded two key junctions in the area, namely the Emmbrook Road/Reading Road and the Emmbrook Road/Commons Road junctions. Although the ERA October 2013 count does not give figures for the Reading Road, due to a lack of resource, it is clear from Table 1 that both these junctions are heavily trafficked.

On reflection, it is clear that these are serious omissions that are likely to result in Emmbrook Village being subjected to unacceptable levels of traffic with no mitigation measures being put in place to deal with it. This conclusion is supported by the outcome of WBC's ATC survey undertaken during October 2014, which is discussed in more detail below. This survey showed that the normal peak hour traffic on the Emmbrook Road by the railway bridge is actually **56%** higher than the WSTM3 2010 figure in the morning and **186%** higher in the evening. Under the circumstances the question has to be asked why have WBC consistently failed to ensure that these omissions are rectified?

The automatic traffic counts (ATCs) were carried out in mid-June and although they are not so close to the school summer recess as the manual counts, they are still sufficiently into the summer holiday period that they can be expected to show lower figures than would be expected at other times of year.

The above comments and observations remain valid.

As the ATC locations were, in the main, sited away from the junctions it is not possible to directly compare their outputs with those of the manual counts. However, the Emmbrook Road/Toutley Road/Matthewsgreen Road junction was sufficiently close to the Emmbrook Road and Toutley Road ATC locations for it to be expected that the ATC and MCC outputs for these roads would be similar. As can be seen from Table 3 below this is not the case for the Emmbrook Road, with the differences large enough to call into question the validity of the ATC outputs here.

TABLE 3 - Comparison of ATC & MCC peak hour outputs for Emmbrook & Toutley Roads
Note all figure are in basic vehicle flows

		A M		P M	
ROAD	DIRECTION	SMA June 2014 ATC	SMA July 2014 MCC	SMA June 2014 ATC	SMA July 2014 MCC
Emmbrook Road	West Bound	155	277	272	350
	East Bound	188	406	142	179
Toutley Road	North Bound	51	46	50	56
	South Bound	50	56	81	85

The above comments and observations remain valid.

Wokingham Borough Council's Traffic Survey

In October 2014 Wokingham Borough Council (WBC) commissioned a week long ATC survey at 10 locations in the area. This survey was carried out to check traffic speeds, but in the process also produced useable traffic volume data. Unfortunately, the locations of the ATC's did not match those of SMA's ATC or MCC surveys earlier in the year, so could not be used to verify the SMA data. However, it was possible to compare the peak hour figures for three roads with those from the ERA's October 2013 traffic count as shown in Table 4. As can be seen from the table there is a reasonable degree of agreement between the two sets of figures, which increases confidence in the ERA count being a more accurate reflection of the traffic flows in the area than SMA's 15th July 2014 MCC.

TABLE 4 - Comparison of the ERA's manual count with WBC's ATC survey
Note All figures are for peak hour flows in PCUs
WBC figures are mid-week averages

		A M		P M	
ROAD	DIRECTION	ERA Oct 2013	WBC Oct 2014	ERA Oct 2013	WBC Oct 2014
Emmbrook Road	South Bound	200	219	314	272
	North Bound	339	345	143	172
Old Forest Road	South Bound	194	194	213	174
	North Bound	274	288	186	176
Clifton Road	South Bound	82	106	94	87
	North Bound	144	120	79	62

The above comments and observations remain valid.

The Developer's Traffic Modelling

Paragraph 5.3 of the Transport Assessment (TA) states:

Following discussions with WBC, it has been agreed that data obtained from the WSTM3 would be used to assess the traffic impact associated with the Matthewsgreen development proposals and wider NWSDL.

From this, and in the absence of any statement to the contrary, it is understood that the 2014 traffic survey commissioned by the developer has not be used to update and correct the anomalies in the 2010 baseline outputs of the WSTM3 highlighted above. This understanding is supported by the fact that the 2026 turning flow diagrams given in file "WSTM3_2026_TurningFlows Combined" exhibit some of the same anomalies found in the 2010 baseline diagrams, and by the absence of 2014 baseline turning flow diagrams based on the traffic survey. Clearly this is not a good platform on which to base future year predictions, as these anomalies will simply be carried forward and possibly magnified by the process.

It is not possible to properly assess how much of a problem this is as the developer has not supplied 2026 Scenario A turning flows data to compare the 2010 baseline figures with. A prime example is the Emmbrook Road between the Reading Road junction and the railway bridge. The 2010 baseline total AM peak flow is 361 pcu, the ERA 2013 count indicated the more realistic figure was in the region of 540 pcu, which is supported by the 560pcu returned by WBC's ATC survey. The 2026 Scenario C1 prediction is 719 pcu. Does this mean that the more accurate figure for 2026, based on the ERA count and WBC ATC survey is likely to be around 900 pcu?

Paragraph 5.23 of the Transport Assessment states –

Vehicular trip rates included within the WSTM3 have been applied to the Matthewsgreen Farm development proposals. Whilst only 760 dwellings are proposed on site, the trip generation applied to the site has been based upon the site's allocation within the Core Strategy for 810 dwellings. The assessments carried out as part of this TA are, therefore, considered to represent a worst case scenario and are therefore robust.

Although it is not disputed that the WSTM3 modelling has been based on 810 dwellings, it should be noted that it does not necessarily represent the worst case scenario and is not as robust as claimed as shown by the foregoing. To summarise –

- The traffic surveys commissioned by the developer were carried out in the summer holiday season and as shown by the ERA traffic counts understate the current normal traffic levels by a significant margin

- Where the survey points match, the WBC ATC October 2014 survey agrees with the ERA October 2013 traffic count with an acceptable degree of accuracy

- The traffic surveys did not include the Reading Road/Emmbrook Road or the Emmbrook Road/Commons Road junctions. Both of these are important, heavily trafficked junctions in Emmbrook, with the Reading Road/Emmbrook Road one predicted to be over capacity by 2026 by the North Wokingham Highway Study (NWHS)

- Again as shown by the ERA traffic counts the WSTM3 traffic model does not truly reflect the current traffic levels, with those in the centre of Emmbrook significantly under estimated by the model. Consequently the 2026 projections must in all probability contain the same optimistic inaccuracies

- The impact of the development's access ways onto Matthewsgreen Road has not been assessed. They have not been included in the SATURN traffic modelling and no separate data has been supplied. The developer states that anti-rat running measures would be designed in but fails to state what these would be so no assessment of their likely effectiveness can be made

- The impact of the current application to build 300 dwellings in the eastern section of the North Wokingham Strategic Development Location has not been included in the assessment. Although this will not affect the level of traffic generated by this development it will have an impact on the overall traffic growth.

Paragraph 5.24 of the Transport Assessment goes on to say -

It is understood that whilst the Core Strategy proposed delivery of all SDL's within Wokingham Borough by 2026, WBC has confirmed that not all development is likely to be delivered by this time. It is, therefore, concluded that the trip generation for 2026, which includes full delivery of all SDL's within the Borough presents an absolute worst case for the whole surrounding road network.

Although the traffic levels in 2026 may be less than anticipated, mainly due to the developers' failure to keep to planned timescales, and bearing in mind the faults detailed above, the modelling would not represent the worst case at the eventual completion of the developments whenever that may be. In fact, if the completion is delayed by a significant time, the model would not include the general background increase in traffic that could occur in the intervening period and thus could present an under estimate of the traffic prevailing at completion.

All comments and observations in the above section remain valid.

The Alternative Alignments of the Eastern Section of the NDR

At the Council's request, the developer has modelled eight different alignments for the Northern Distributor Road from its junction with the A321 Twyford Road to the junction with the A329 Reading Road. As the study looking into the feasibility of the various alignments is not due until April/May 2015 there seems little point in making a detailed analysis of the model outputs at this stage, particularly as their reliability is in question. However, a simple comparison of Scenarios C1, C5 and C7 has been made looking at the predicted peak AM and PM traffic in Emmbrook associated with each scenario, the results of which are given in Table 5 shown in Appendix 2.

Since the submission of the original submission, WBC has stated that the NDR study is expected to be ready for consideration at the March Executive Meeting. However this is still too late for it to be considered in the examination of this application on February 25th.

Bearing in mind that the figures have to be treated with some caution, Scenario C1 where Toutley Road and Old Forest Road are used as the NDR from its exit from the development to the Reading Road, unsurprisingly, showed the highest impact on the traffic in Emmbrook. Scenario C5, which loops the NDR to the north of the business estates to run down the side of the M4 motorway to a new junction with the Reading Road, and was chosen as the preferred route in the 2013 consultation by some considerable margin, showed the least impact on Emmbrook. Scenario C7, which

loops the NDR to the north of the business estates to join the Old Forest Road and then leave it just past the Emmbrook Bridge to run down the side of the motorway in a similar fashion to Scenario C5, showed traffic levels in between the other two scenarios.

The above comments and observations remain valid.

Traffic Flows at Junctions in Emmbrook

Emmbrook Road/Commons Road Junction

The ERA October 2013 traffic count indicated that Commons Road carries a total of over 400pcus in the morning peak and 280pcus in the evening. This is a considerable volume considering that it is a residential street which for over half its length is less than 5m wide, and is subject to a 7.5 ton weight limit. The southern section of the Emmbrook Road was similarly shown to carry 550pcus and 470pcus respectively in the morning and evening peaks, again a considerable volume of traffic considering it is constrained by the one way working under the railway over bridge and by residential parking from the nineteenth century terraced cottages.

This traffic is largely due to commuters using these roads together with Matthewsgreen Road as a cut through from the Reading Road via Old Forest Road to the A321. This situation is likely to be made worse if Old Forest Road becomes part of the NDR, as they will form part of a convenient bypass to avoid the traffic calming measures on the NDR route through the centre of the new development.

The above comments and observations remain valid.

Reading Road/Emmbrook Road Junction

The North Wokingham Highways Study dated 29th July 2013 (NWHS) stated in section 5.2.7 that the southbound lane of the Emmbrook Road arm at its junction with the Reading Road would be over capacity during the PM peak in 2026 if the applicant's favoured alignment of the NDR was adopted. This was based on a traffic flow of 286pcu/hr which had been derived from a WSTM3 2010 baseline figure of 180pcu/hr. The ERA October 2013 count gave the much higher figure of 314pcu/hr for the baseline as shown in Table 3. From these figures it is reasonable to conclude

TABLE 6 - Comparison of peak hour traffic assessments on the Emmbrook Road arm of Reading Road and Emmbrook Road junction

	AM			PM		
DIRECTION	ERA Count Oct 2013	NWHS FNDR	Scenario C1	ERA Count Oct 2013	NWHS FNDR	Scenario C1
South Bound	200	166	135	314	286	285
North Bound	339	365	474	200	52	59

that the situation is very likely to be worse than the NWHS predicts with the Emmbrook Road traffic flow likely to be over capacity at other times as well. This is more than likely to cause queuing southbound traffic on the Emmbrook Road to block the one way working carriageway under the railway bridge approximately 100m to

the north. In order to improve the traffic flow at the junction the improvements proposed in the NWHS appendix M fig 6, or something similar, would be essential.

The above comments and observations remain valid.

Reading Road/Old forest Road Junction

Sections 6.5 to 6.13 of the Transport Assessment deal with this junction as it is predicted to be over capacity in 2026. They conclude that installing traffic lights with a dedicated right turn lane on the eastern arm of the Reading Road and widening Old Forest Road to a two lane approach to the junction would solve the problem. However, the current state of the traffic at the junction indicates that these improvements would not have a great impact in reducing the congestion which is due mainly to the heavy west bound traffic on the Reading Road. It should also be noted that this solution was suggested in the NWHS which also acknowledged that it would increase queuing on the Reading Road.

The 2026 junction turning movements given in Appendix J of the Transport Assessment indicate that the traffic turning right from the eastern arm of the Reading Road would be in the low tens, and the existing dedicated right turn lane would be adequate for this level of traffic. The level of traffic turning left out of Old Forest Road is of a similar magnitude and providing a two lane approach to the junction would have a minimal impact on the Old Forest queues.

The southbound Old Forest Road is prone to heavy queuing, with the one way working railway bridge sometimes blocked by queuing traffic. Experience indicates this happens mainly when the traffic on the Reading Road is moderate or heavy but flowing. This is because when traffic on the west bound Reading Road is crawling or queuing it is more inclined to allow traffic to turn right out of Old Forest Road than it is when flowing more freely. The drawback to this is, of course, that the Reading Road queue stretches at least 1.2km to the Winnersh crossroads.

The forecast analysis of the junction given in Table 6.1 clearly gives a hopelessly false impression of the performance of the proposed junction improvements, as it fails to take into account the frequent over capacity state of the west bound lane of the Reading Road. In order to demonstrate the true state of traffic around this junction the ERA asked some members to make a brief record of the traffic whenever they passed through it, the results of which are given in Table 7 shown in Appendix 3.

Since this survey, WBC has stated that they have adjusted the traffic lights at the Winnersh crossroads in order to reduce the queueing back along the Reading Road. However, ERA members who regularly use this part of the Reading Road state that there has been no significant improvement in the traffic flow, with queues frequently forming past the Old Forest Road junction, particularly during the morning peak.

The developer has not presented a coherent case for his proposed improvements to the Reading Road/Old Forest Road junction. Firstly, the two tables, 5.3 and 6.1, showing the before and after cases are given in two completely different units, making it impossible to make a direct comparison between them. Secondly, he refers to a sketch of the proposed junction improvements, SK01, but has not supplied a copy of it. Thirdly, his improvements will completely fail unless the existing congestion on the east bound Reading Road is dealt with. Finally, his analysis is

based on traffic counts taken during the summer holiday period, and considering the low values of the 2026 practical reserve capacities given by his modelling, his solution cannot be considered robust.

Section 6 of Technical Note 2 states that the 2014 baseline traffic flows have been updated to use the actual peak flows which occur at slightly different times to the "normal" times of 8.00 - 9.00 and 17.00 - 16.00. Technical Note 3 also states -

2026 Future Year Assessments – As with the 2017 sensitivity tests, the future year assessments took account of revised junction geometries and assessed the traffic impact of the full NWSDL on the surrounding network for all potential NWDR alignment options.

Where junction capacity assessments indicate that the junction would suffer from congestion, appropriate mitigation measures have been considered and modelled. Each of these proposed junction improvements are summarised in Drawing 4676.053.

All 2026 junction modelling output files have been reviewed and approved by WBC Highways.

In view of the detailed future year assessments completed for the various junctions, it is considered that the proposed improvements would successfully mitigate the traffic impacts of the development proposals and wider NWSDL.

It is difficult to reconcile the above statements with the 2026 modelling output files posted on the WBC planning application website. The only file that appears to show a summary of 2026 junction performances is Junction Results Full.pdf, although it is not actually referred to in any of the text. The headings for the tables shown in this file indicate that they are for eight options for the NDR alignment within Scenario C (i.e. Scenarios C1 to C8) for the ten junctions modelled. WBC has defined Scenario C as being **"***with SDL developments, with on-site infrastructure provision and with off-site transport interventions required to mitigate impacts of development*". The figures given in this file indicate that a significant number of junctions would be overcapacity. A prime example is the Reading Road / Old Forest Road junction, where the file shows the Old Forest Road arm as having a RFC of between 4.1 and 7.6 for Scenarios C1, C2 and C3. This means this arm would at between 4.6 and 7.6 times its capacity at some peak times. It is also noted that the table headings state that the results are for the normal peak times of 8.00 - 9.00 and 17.00 - 16.00 and not the actual peak/worst case times requested by WBC. **The only conclusion that can be drawn from this is that the developers have failed to publish any evidence to support the claims made in Technical Notes 2 and 3 shown above, and the presentation of their case has become even more incoherent and confused than their original one.**

The Development Egresses

Table 5.1 of the Transport Assessment indicates that only the developer's non-preferred alignments of the NDR (Scenarios C2 to C8 incl) would also have three development egress ways onto Matthewsgreen Road. This is misleading as Figure 3.3 of the Environmental Statement (ES) clearly indicates that they would be present in the developer's preferred alignment (Scenario C1) as well. Also Paragraph 3.1.3 of the EA states

EIA parameter plans are not 'illustrative'. If planning permission is granted for the proposal it would include a planning condition to ensure that the development takes place in accordance with the plans (Figure 3.3 of the ES).

The proposed development egresses onto Matthewsgreen Road raise some concern over the amount of extra traffic they could introduce onto this road. The developer has stated that the centre access would only service a cul-de-sac of 30 dwellings located on the site of the old farm buildings, which would clearly cause no great amount of traffic. The other two do provide access to the main body of the development and, as the illustrative masterplan indicates, will connect with the NDR. These access ways do not appear on the traffic modelling flow diagrams, so no assessment of the traffic these access ways will introduce onto Matthewsgreen Road is given. Also, it is apparent that the model assumes that all the development's traffic will only use the NDR accesses which throws further doubt on the validity of the model's predicted distribution of the traffic associated with the development.

This issue has not been addressed in the latest submission.

The main cause for concern regarding access to the development is the junction of the NDR onto Toutley Road, a road that is entirely unsuitable to take the extra traffic that will ensue. Even the questionable figures given by the Transport Assessment show the increase in peak traffic to be **800%** in the morning and **670%** in the evening, which will obviously have a severe impact on the existing residents, particularly those of Toutley Cottage. This traffic is to be introduced onto a road that is only 5.5m wide at the Ashridge Stream bridge, a width that the Transport Assessment considers only adequate for secondary streets within the development. (ref Paragraph 4.35).

In the event that an alignment of the NDR that avoids Toutley Road is proved feasible, the whole site access onto Toutley Road required by Scenario C1 must be abandoned. This is necessary to avoid rat running onto Toutley Road, although an egress that provides access to a small cul-de-sac or bus only access may be acceptable.

With reference to the Toutley Road Access & NDR Alternative Alignment, Technical Note 2 states in section 4.1 –

Further to ongoing discussions with WBC and comments made at a meeting on 1st December 2014, ***Drawing 4676.036*** *shows the road alignment if the NWDR routes north through the Gleeson land. This clearly shows that this option would not connect with the existing Toutley Road. Only a small number of dwellings (20-30) would be accessed via Toutley Road and, on this basis, traffic impact on Toutley Road would be minimal.*

Drawing 4676.036 shows that the alternative alignment of the NDR for Scenarios C3, C5 and C7 approaches Toutley Road near the bend in this road, but does not connect to it here. However it also shows a vehicular access way onto Toutley Road further to the north but does not show what purpose this access way serves, or if does provide an indirect connection to the NDR. In contrast drawing 2197-A-1008-B ALTERNATIVE ILLUSTRATIVE MASTERPLAN WITH NWDR – OPTION C shows the NDR as connected to Toutley Road via a vehicular access way with bus gate. Consequently it is unclear what precisely is intended here.

Access to the Development

The Transport Assessment states in Paragraph 3.28 that -

The site also enjoys good pedestrian/cycle links on the surrounding roads and has access to public transport services along Matthewsgreen Road. The town centre can be accessed via a series of residential pedestrian routes and the number 128 bus service also provides a connection with the town centre, from which the train station can be accessed

Similarly Paragraph 6.6.10 of the Environmental Statement says-

High quality footways then run between Matthewsgreen Road and the Wokingham town centre via a number of routes, with the most direct route being along Milton Road.

Although the development is clearly within walking or cycling distance of the town centre or the supermarket in Woosehill for any reasonably fit person, the situation is not quite as good as the developer would claim. As stated, the most direct route into town is via Milton Road, which only has a footpath on its eastern side, which is only 1.1m wide between the Matthewsgreen Road and Jubilee Road junctions. The carriageway is also fairly narrow so there is no opportunity to widen the footway, or to safely provide a cycle way. Emmbrook Road is better as it does have footways on both sides of the carriageway for most of its length, although the section from the railway bridge to the junction with the Reading Road has only a narrow footway on one side. Again, there is little opportunity to safely provide a cycle way.

As mentioned elsewhere the section of Toutley Road the developer proposes using as part of the NDR for options Scenarios C1 and C6 is of substandard width and constrained by the properties each side of it, so the boulevard nature of the NDR will come to an abrupt end on joining this road.

The 128 bus service mentioned in the Traffic Assessment runs 7 hourly services on weekdays starting at 10.08AM to the town centre, and 7 to Reading starting at 9.10AM with the 129 providing a further 2 at 3.50PM and 4.46PM. The weekend service runs on Saturday only with 5 to the town centre and 6 to Reading. This can hardly be considered a first rate service and would obviously be of little use to commuters.

The more detailed proposals of pedestrian and cycle improvements to access between the site and key destinations is a marked improvement over the original submissions. However, the following points should be noted –

> The proposal to widen the footway along Milton Road between the Matthewsgreen Road and Jubilee Road junctions together with the possibility of providing a cycleway within Cantley Park alongside this section of road would provide a good solution here. However, the footway from Jubilee Road junction to the Town Centre remains as is with no possibility of providing a cycleway.
>
> The proposal to construct a zebra crossing adjacent the Emmbrook Senior School (ref drg 4676.048) would only be 70m from the existing pelican

crossing outside the junior schools. A better solution may be to provide a zebra crossing on Clifton Road near its junction with Matthewsgreen Road. Together with the proposed crossing on Matthewsgreen Road adjacent to the footpath from the site (ref drg 4676.035E) this would provide a safe route from the site to the senior school as well as a safe crossing on Clifton Road for other users.

Proposed improvements to the footpath connecting Millmead to Brook Close – this footpath becomes very wet in wet weather, with water running down the path under the railway bridge. This problem would need to be resolved as part of the improvements.

Construction of the Development

The developer has stated that it is normal for developments of this size to be built at around 50 dwellings per year, so although two developers are involved here, the construction phase could well last for seven years or more. In view of this, it is reasonable to expect Wokingham Borough Council to use the experience gained from other large builds, such as Montague Place and the Kentwood Farm developments, to ensure that undue disturbance and annoyance to existing residents caused by dust, mud on the roads, construction noise, inconsiderate parking by construction workers, etc., is kept to an absolute minimum.

Of particular concern is the construction traffic. The developer states that they intend starting construction in the area at the corner of Toutley Road and Matthewsgreen Road. The temptation here inevitably will be to use these two roads or Emmbrook Road and Commons Road to access the site. As emphasised by all the residents' representatives present at the meetings with the developers, these roads are not suitable for the amount of HGV traffic that this would entail and would be totally unacceptable to existing residents.

Paragraph 4.53 of the Transport Assessment states –

Construction would require use of heavy excavation plant, lifting facilities, deliveries by HGV's and light vehicles transporting staff and workforce to the site. Specified routes for construction traffic would need to be established to avoid construction traffic passing through residential and other sensitive areas.

This being the case, it is obvious that the only construction access that would fulfil these requirements would be via the A321 Twyford Road with the most practical option being at the point where the NDR would enter the site. Under the circumstances it is reasonable to expect the Planning Authority to ensure that this arrangement is adhered to by imposing a planning condition or by other suitable means.

Drawing 2197-A-1018-A ILLUSTRATIVE PHASING PLAN shows the eastern section of the NDR and its junction with the A321 Twyford Road as Phase 1A of the construction. This would indicate that the developers may have acceded to the residents' and councillors' request that this junction be used as the access point for the construction traffic. However, as this is not confirmed in any of the text supplied this cannot be taken as being confirmed.

The Development

Noise

Residents of the areas nearest the M4 and A329(M) motorways state that the noise from them is very intrusive, particularly when the road surfaces are wet, and does affect the amenity of their homes. Even in the heart of Emmbrook, some 700m away from the nearest motorway the noise can plainly be heard and is intrusive, particularly at night when sleeping with a window open can become impossible. Under these circumstances it is difficult to understand how the noise assessment in the Environmental Statement can conclude that the problem can be solved by installing double glazing in the dwellings, something that is standard practise anyway.

An explanation of this is the date and time the noise measurements were taken. It is understood that they were carried out between 11:20hrs and 16:00 on the 10th December 2013. This was clearly timed to miss the morning and evening traffic peaks when noise levels would be expected to be at their highest. Also, the Wokingham Weather Station records for the 10th show that the average wind speed was 0.7mph (1.1km/hr), gusting to 10.7mph (17km/hr) from the south, with no precipitation. The National Planning Practice Guidance (NPPG), published March 2014, provides the following advice on how to determine the noise impact on development:

Local planning authorities' plan-making and decision taking should take account of the acoustic environment and in doing so consider:

- *Whether or not a significant adverse effect is occurring or likely to occur;*
- *Whether or not an adverse effect is occurring or likely to occur; and*
- *Whether or not a good standard of amenity can be achieved.*

Considering that the noise survey was carried out in highly favourable weather conditions for recording the least noise from the motorways and business park, and takes no account of average conditions, it cannot be considered to comply with the NPPG.

The above comments and observations remain valid.

Layout

The Adopted North Wokingham Strategic Development Location SPD clearly shows that the Council's preferred location for the "local centre", referred to as the neighbourhood centre, is the junction of Toutley Road and Matthewsgreen Road. Referring to this location note 3 on page 21 states -

"Land for Neighbourhood Centre assumed to be up to 1.5 ha" and "other sites may be available but the overriding principle is one of co-location of local services and facilities to create recognisable community hubs.

Design principle 4a(i) on page 49 reinforces this theme saying

In accordance with the Strategic Framework Plan provided in the preceding section of this SPD, the development will provide for one neighbourhood centre. It will be located in the western neighbourhood close to the existing residential area.

The developer has ignored this requirement, placing his local centre further to the north on the NDR, claiming that the land in this corner is required for surface water storage as part of the sustainable drainage scheme for the development. However the Illustrative Masterplan, drawing 2197-A-1005-F, clearly shows dwellings grouped immediately to the north of the drainage scheme. This being the case, there is no reason why the local centre could not be located there instead.

Under the Conditions and Planning Obligations, the SPD also requires a multi-use community centre to be provided as part of the neighbourhood centre as made clear in Paragraph 6.5.4 and in the Core Strategy. Communal facilities such as this are essential in providing a focus for community activities and cohesion and a sense of community wellbeing. The nearest existing such facility is the Emmbrook Village Hall. The management committee of this hall state that the regular repeat bookings amount to over 6 hours per day, with activities ranging from religious services to pilates, which cater for all age groups from pre-school children to senior citizens. On top of this are the occasional bookings for birthday parties, family gatherings, dance/music practise and meetings, all of which means that it is well over subscribed, having to turn down many requests for bookings. However, there is no mention anywhere in the documents supplied of any such facility indicating that the developer has no intention of providing anything at all or even assisting in is provision in conjunction with other organisations that could co-sponsor it.

The Illustrative Masterplan and the Building Heights Parameters Plan, drawing 2197-A-1013-G, show that the NDR is routed through the centre of the development and the local centre and past the primary school. It is also noted that the traffic turning flow diagrams indicate that the NDR in the centre of the development is forecast to carry a total of 1100 and 930 vehicles per hour in the morning and evening peaks respectively.

The question why is it thought such a good idea to route this amount of traffic through a residential and pedestrian area needs answering. The Design and Access Statement states in Section 6 that –

The design objective was to balance what are termed the 'link' and 'place' functions of the public highway. The link function is movement to, from and through the area. The place function is the range of other activities that the public highway accommodates in creating a vibrant, healthy and safe place to live and an active centre for the local community.

The actual answer here, of course, is that with this level of traffic there is no balance between link and place. The place function of "creating a vibrant, healthy and safe place to live and an active centre for the local community" will be overwhelmed by the link function. The Design and Access Statement and Transport Assessment both state that the local centre would be "a shared surface area, designed to promote pedestrian movement across the NWDR and to reduce vehicle speeds adjacent to the proposed Primary School". So it is proposed that the best way to improve pedestrian safety and "calm" the traffic is to force the pedestrians to interact with the traffic as much as possible when going about their daily business!

And what of the school? The last week in November was Road Safety Week promoted by the road safety charity Brake. Part of their safety promotion included the following:

“Brakes’s survey of 600 primary school children in the south east shows

- Three in five (60%) think roads in their community can be dangerous for walking and cycling;

- Two in five (43%) say they have been hit or nearly hit by a vehicle while on foot or bike”

Also, the Common’s Environmental Audit Committee recently concluded that new schools, care homes and hospitals should be built far away from major roads because of the dangers of air pollution, stating that “it is important to stop a new generation of children being exposed to the problem”.

Yet the school is located just about as close to the A329(M) and the NDR as it is possible to get, with its main entrance actually on the NDR. Even the school car park is situated on the other side of the school forcing the staff arriving by car to drive over the main access ways to the school in order to park.

The developer has stated that the location of the school and associated playing fields has been chosen to open out the view to the north and make the development seem less crowded. However, placing them more to the south, in the centre of the development, would have a similar visual impact and improve the health and safety aspects of the development.

All the above comments remain valid as the layout is not changed in any of the significant details.

Conclusions

To summarise the primary issues raised above –

- The WSTM3 2010 baseline understates the current volume of traffic in Emmbrook and does not reflect the true distribution of this traffic. The consequence of this is that the modelled future year traffic flows must under estimate the traffic volume and misrepresent its distribution

- The developer’s traffic surveys took place during the summer holiday season, with the manual counts, in particular, taking place just one week before the schools broke up for the summer recess. The consequence of this is that, as demonstrated by the ERA manual counts and the WBC ATC survey, the developer’s surveys understate existing traffic levels. Again, this will result in the modelled future year traffic flows based on this data being under estimated

- The developer failed to survey two heavily trafficked junctions in Emmbrook, namely the Reading Road/Emmbrook Road and the Emmbrook Road/Commons Road junctions. The consequence of this is that no future year analysis of these junctions has been carried out. This is particularly important for the Reading Road/Emmbrook Road junction which was forecast to be over capacity in 2026 by the NWHS

- The developer's solution for mitigating the forecast over capacity of the Reading Road/Old Forest Road junction will not work even if the traffic congestion on the west bound carriageway of the Reading Road is solved. This is because it is based on under estimates of the traffic which will absorb the forecast reserve capacity

  The developer's revised submissions have only served to add confusion here, as the Scenario C1 junction performances show that this junction would be chaotically over capacity in 2026

- The existing residents of Toutley Road and the cul-de-sacs off it will be severely impacted by the magnitude of the extra traffic introduced if this totally unsuitable road is made part of the NDR

- The proposed development egresses onto Matthewsgreen Road are likely to be used as rat runs due to the traffic calming measures that will be necessary on the section of the NDR passing through the development, particularly in view of its alignment past the school and through the local centre. The developer has provided no modelling of these egresses or explained how rat running will be stopped from occurring

- The noise measurements used to conclude that only minimal measures are needed to mitigate the motorway and commercial estate noise were carried out under a most favourable set of weather conditions and cannot be taken as representing the normal noise levels on the site

- The plan to route the NDR through the most populated and used part of the development may conform to the latest fashion in town planning but is clearly perverse and unsafe

- Although it may conform to the planning principle of placing statement buildings on the main thoroughfare, the proposed location of the school could not be much worse from a health and safety perspective

In addition to the primary issues there are issues of perhaps secondary importance that need to be addressed. These include -

- The developer's assertions over the suitability of the local links to support sustainable modes of transport to the site contain misrepresentations and inaccuracies. Although this may not be considered a major issue, it certainly shows how the documentation supplied cannot be seen as giving a fair and unbiased view of the issues.
  It is noted that the submitted improvements to pedestrian and cycle access does overcome many of the shortcomings in the original submission, although due to constraints in the existing infrastructure some remain

- The developer concedes that during the construction of the development there is a need to mitigate the adverse effects the construction will have on the existing community, but defers addressing them until a later date. This is clearly unacceptable; the mitigation measures required need to be defined and agreed at the outset, particularly in regard to construction traffic which needs to be confined to the A321 Twyford Road.
  Although the developer has submitted plans on the phasing of the development that indicate that they accept this aspect of the suggested mitigation measures, there is no evidence that they have committed to them

- The development does not integrate with the adjacent settlements as required by the north Wokingham SDL SPD. In fact, with the local centre, amenities and school located to the centre of the development, it is inward looking and fails to connect with Emmbrook or Joel Park. It should be noted that providing multiple vehicular egresses into the adjacent developments does not constitute integration

- No community facility is to be provided for the residents although evidence shows that existing centres are very well used by existing residents and are a vital amenity to the community

In view of the many issues with this application detailed above it is difficult to see how it can possibly be approved in its present form. One of the main issues is the fact that the traffic modelling does not align with the current levels and distribution of traffic in the area and therefore cannot provide a robust baseline to accurately forecast future years' traffic. As mentioned above this problem was pointed out to the Council by the ERA during the NDR consultation a year ago in both its written submission and in discussions with Council officers. However, it is apparent that nothing was done to overcome the problem, and that the situation regarding modelling and forecasting the traffic in Emmbrook is no further forward than it was in 2009, when the Inspector who conducted the public examination of the Core Strategy felt compelled to include the following statement in his report –

As discussed in the section dealing with North Wokingham SDL, I am not convinced that the traffic modelling has been sufficiently robust in assessing the likely impact on residential streets leading to and from a partial NRR (currently referred to as the NDR Scenario C1). It is clear to me that extra traffic from 1,500 new dwellings would increase the pressure on already constrained residential roads if no new outlets at each end of a partial NRR were to be provided. At present the CS does not include any firm requirement for a new partial interchange on the A329(M) at Ashridge. This may enable some benefits through the reduction of traffic in Wokingham town centre. However, these benefits and the new housing development should not be achieved at a disproportionate cost to local residents through increased traffic in a residential environment.

The above leads onto another important aspect, which is that the Council are months away from being able to decide on the alignment of the eastern section of the NDR. As is well known, in response to the 2013 consultation, the Council promised the residents that they would use every endeavour to provide the alignment overwhelmingly chosen by them, or as near to it as they could practically get. However, this application is based on the Toutley Road and Old Forest Road route

(the partial NRR referred to in the Inspector's report) emphatically rejected by residents. Consequently, if the Council were to give unconditional approval to this application it would give tacit approval to this route which the developer could decide to act upon despite the Council's stated promise to provide the residents' preferred alignment.

With regard to the NDR, the developers have expressed their flexibility over the issue of its alignment, and have produced illustrative masterplans showing the alternative alignments in greater detail than before. Also, the Council have stated that the technical report is expected sooner than indicated above, although not before this application is considered. Thus it is vital that the Council retains control over this issue if the application is approved prior to the decision on the NDR alignment is made.

Yours sincerely

Paul Gallagher
Chairman
Emmbrook Residents' Association

Enclosed:

Appendix 1
COMPARISON OF JUNCTION PEAK HOUR FLOWS – WSTM3 2010BASELINE, ERA SURVEY, SMA 2014 BASELINE

Appendix 2
COMPARISON OF TOTAL PEAK HOUR VFLOWS - SCENARIOS C1, C5 & C7

Appendix 3
CASUAL OBSERVATIONS OF READING ROAD/OLD FOREST ROAD JUNCTION